

June 13, 2006

The Honorable Thomas J. Molnar, Mayor  
The Township of West Amwell  
150 Rocktown-Lambertville Road  
Lambertville, NJ 08530-3509

**Re: West Amwell Township Petition for Initial Plan Endorsement  
Request for Additional Information and Extension of Consistency Review Period**

Dear Mayor Molnar:

The Office of Smart Growth (OSG) and our state agency partners have reviewed the West Amwell Township petition for Initial Plan Endorsement and would like to commend the Township for its active participation and dedication to the Plan Endorsement process. However, consistency issues remain that need to be resolved before OSG can recommend this petition for endorsement by the State Planning Commission (SPC).

Overall, the Township's plan was appropriate, comprehensive and well thought out. However, pursuant to N.J.A.C. 5:85-7.5(f), I would like to request additional information, as outlined within this letter. This request is made in order to clarify some concerns and assist with the evaluation of your petition for consistency with the goals, policies and strategies of the State Development and Redevelopment Plan (State Plan). Additionally, we would like to explore various planning strategies not currently contained within the plan to help the Township meet its stated planning goals.

I am requesting that the Township provide this additional information within 90 days. If this suggested amount of time is not sufficient, please let us know and we will work with you to establish a reasonable timeline for submission of the requested information. Once the Office of Smart Growth receives the requested information, we will renew our consistency review of the West Amwell Township petition and prepare a report for the State Planning Commission on the Petition's consistency with the State Plan within 45 days after receipt of the requested information.

**Requested Additional Information**

***Implementation Strategy for Vision Statement and Stated Goals***

The Township's petition lacks clarity on how it plans to achieve its primary stated goals to "emphasize open space preservation, farmland preservation, and protect the township's unique environmental features and characteristics from overdevelopment." Please provide a narrative statement that describes the Township's vision and implementation strategy to manage growth, direct development and preserve and protect environmental resources.

### ***Inconsistencies with the Groundwater Resource Evaluation***

The Township must provide clarification regarding inconsistencies with the Groundwater Resource Evaluation. Specifically, there are inconsistencies between the recommended densities in your Groundwater Resources Evaluation report and the zoning densities in the township ordinance. The Township Planner previously mentioned an open space balancing methodology that addresses these inconsistencies. This analysis should be submitted as part of the petition and as part of the Township's Wastewater Management Plan amendment application.

### ***Population/Employment Projections***

The Township must provide clarification regarding population and employment projections that were submitted separately to both OSG and the Council of Affordable Housing (COAH), as follows:

- In the "Supplement to West Amwell Township's Application for Initial Plan Endorsement" ("Supplement"), the Township attempts to clarify its position on anticipated population growth. The Township claims that West Amwell's population and housing growth will be less than that projected by the Metropolitan Planning Organization (MPO). However, the net residential growth calculated in the Township's Housing Element and Fair Share Plan (211 units) significantly exceeds that projected by NJTPA (20 units). The Township must explain this discrepancy.
- The Supplement appears to be internally inconsistent. In one place it states that 2005-2015 residential growth is expected to be 21.1 dwelling units per year, which is consistent with the Fair Share Plan projection. That statement is followed, however, with the statement that "this data is not reflective of anticipated future growth" due to two unusually large developments that occurred during the period 2001-2004. The Township must clarify what the expected residential growth is and whether or not it is consistent with the information provided in the Housing Element.
- Under COAH's Third Round Rules, N.J.A.C. 5:94-2.2(b)4, a municipality is to use the MPO's household projections when available. Instead of using the North Jersey Transportation Planning Authority's figure of 20 for household growth, the Township calculated household growth by applying the Census figure for household size of 2.5 to the MPO's change in population figure ( $40/2.51 = 15.94$ ). In either case, however, the household projections are much less than the net residential growth figure of 211 units calculated by West Amwell. As noted above, the Township must explain why it claims that West Amwell's growth will be less than that projected by the MPO.

### ***Zoning***

Although the municipal zoning plan encourages mixed-use development in the Highway Commercial zoning district, it is not clear how the permitted density could be achieved. Also, the Township's cluster ordinance is unique in concept, however we need to understand how it is being implemented. We would additionally like to offer technical assistance to help Township develop an implementation strategy appropriate for West Amwell Township.

## **Planning and Implementation Agreement (PIA)**

As we work with the Township to develop an implementation strategy to address the items mentioned above, we will also discuss and identify tasks that may need to be added to the Planning and Implementation Agreement to achieve the goals established by West Amwell Township.

### **Conclusion**

Pursuant to N.J.A.C. 5:85-7.5 (f), the Township must submit the additional requested information identified above in order for the petition to be evaluated for consistency with the goals, policies and strategies of the State Plan. OSG and our state agency partners will work with the Township to revise the petition to include the items identified within this letter and help the Township achieve Initial Plan Endorsement

Again, we look forward to meeting with you in the near future to discuss the next steps. Barry Ableman, Area Planner for Hunterdon County, will contact you to arrange a meeting to establish a strategy to ensure that the Township is able to address the consistency requirements outlined in this letter.

Thank you again for your commitment to the Plan Endorsement process. If you have any questions or concerns, please feel free to contact Barry Ableman, Area Planner for Hunterdon County at (609) 292-3228 or via email at [bableman@dca.state.nj.us](mailto:bableman@dca.state.nj.us).

Sincerely,

Eileen Swan  
Executive Director

ES:ba:dds

c: Lora Olsen, Municipal Clerk  
Anthony P. Mercantante, PP/AICP, Planner  
Joseph I. Donald, PP, Deputy Executive Director, OSG  
Courtenay Mercer, PP/AICP, Planning Director, OSG  
Ben Spinelli, Policy Director, OSG  
Barry Ableman, Area Planner, OSG